



**Hiland Partners  
Holdings LLC**  
a Kinder Morgan company

**Submitted Excel Spreadsheet via EPA CEDRI**

July 25, 2019

Mr. Eddie Sierra  
U.S. EPA Region 8  
1595 Wynkoop Street  
Mail Code 8ENF – AT  
Denver, CO 80202-1129

**RE: Bakken Gathering Plant  
Permit Number: MAQP #3331-11  
NSPS OOOOa Semi-annual Report January 1, 2019 through June 30, 2019**

Dear Mr. Sierra:

Hiland Partners Holdings LLC (Hiland) is submitting the enclosed Semi-annual Monitoring Report as required by 40 CFR 60 Subpart OOOOa. The monitoring report covers the semi-annual period from January 1, 2019 through June 30, 2019.

The *Part 60 Subpart OOOOa – 60.5422.a(a) Spreadsheet Template* was sent via CEDRI but the database would not accept a PDF of this letter with the Semi-Annual Report Summary and Delay of Repair History forms. The information used to compile the reporting requirements are provided by the LDAR contractor, TEAM Industrial Services.

If you need additional information or have any questions please contact me at (713) 420-6225 or by email at [Anu\\_Pundari@KinderMorgan.com](mailto:Anu_Pundari@KinderMorgan.com).

Sincerely,

(b) (6)

Anu Pundari  
Sr. Engineer – EHS Staff

Attachments:

- OOOOa Delay of Repair report
- OOOOa Semi-Annual Report Jan-June 2019
- Bakken Part 60 Subpart OOOOa – 60.5422a(a) Semiannual Report Template ( CEDRI submittal )

Cc: **Fedex 7886 8453 0106**

Mr. Hoby Rash  
Montana Department of Environmental Quality  
Air Resource Management Bureau  
1530 East 6<sup>th</sup> Avenue  
Helena, MT 59601

**ATTACHMENT 1**  
**NSPS 0000a**  
**SEMIANNUAL LDAR REPORT**

**Semiannual Equipment Leak/VOC Monitoring Report pursuant to NSPS OOOOa**

This report is being submitted to meet the requirements in 40 CFR 60, Subpart OOOOa, *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015*. This report covers the period from July 1, 2018 through December 31, 2018. Below is the specific information required by §60.5422a(a) and (c).

Reporting Period: January 1, 2019 through June 30, 2019

Refrigeration & Overhead Compressors [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
<b>Valves – Gas Vapor/Light Liquid</b>							
60.487a(c)(2)(i)	Leak count	0	0	0	1	0	0
60.487a(c)(2)(ii)	Repaired Late	0	0	0	0	0	0
<b>Pumps – Light Liquid</b>							
60.487a(c)(2)(iii)	Leak Count	0	0	0	0	0	0
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
<b>Pressure Relief Devices – Gas Vapor/Light Liquid</b>							
60.5422(c)(1)	Leak Count	0	0	0	0	0	0
60.5422(c)(2)	Repaired late	0	0	0	0	0	0
<b>Connectors</b>							
60.5422(a) & 60.487a(c)(2)(vii)	Leak Count	0	0	0	0	0	0
60.5422(a) & 60.487a(c)(2)(viii)	Repaired late	0	0	0	0	0	0

Fractionation Train 1 [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
<b>Valves – Gas Vapor/Light Liquid</b>							
60.487a(c)(2)(i)	Leak count	5	3	0	5	1	1
60.487a(c)(2)(ii)	Repaired Late	2	0	0	0	0	0
<b>Pumps – Light Liquid</b>							
60.487a(c)(2)(iii)	Leak count	0	0	1	0	1	1
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
<b>Pressure Relief Devices – Gas Vapor/Light Liquid</b>							
60.5422(c)(1)	Leak count	0	0	0	0	0	0
60.5422(c)(2)	Repaired Late	0	0	0	0	0	0

Fractionation Train 1 [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
<b>Connectors</b>							
60.5422(a) & 60.487a(c)(2)(vii)	Leak count	0	2	0	0	0	0
60.5422(a) & 60.487a(c)(2)(viii)	Repaired Late	0	2	0	0	0	0

Fractionation Train 2 [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
<b>Valves – Gas Vapor/Light Liquid</b>							
60.487a(c)(2)(i)	Leak count	4	2	1	3	0	1
60.487a(c)(2)(ii)	Repaired Late	1	1	0	2	0	0
<b>Pumps – Light Liquid</b>							
60.487a(c)(2)(iii)	Leak Count	1	1	0	0	1	1
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
<b>Pressure Relief Devices – Gas Vapor/Light Liquid</b>							
60.5422(c)(1)	Leak Count	0	0	0	0	0	0
60.5422(c)(2)	Repaired late	0	0	0	0	0	0
<b>Connectors</b>							
60.5422(a) & 60.487a(c)(2)(vii)	Leak Count	0	4	0	3	0	0
60.5422(a) & 60.487a(c)(2)(viii)	Repaired late	0	1	0	1	0	0

Storage Tanks & Loading [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
<b>Valves – Gas Vapor/Light Liquid</b>							
60.487a(c)(2)(i)	Leak count	10	6	2	5	1	1
60.487a(c)(2)(ii)	Repaired Late	0	0	0	0	0	0
<b>Pumps – Light Liquid</b>							
60.487a(c)(2)(iii)	Leak Count	0	0	0	1	0	1
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
<b>Pressure Relief Devices – Gas Vapor/Light Liquid</b>							
60.5422(c)(1)	Leak Count	0	0	0	0	0	1
60.5422(c)(2)	Repaired late	0	0	0	0	0	1

Storage Tanks & Loading [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
<b>Connectors</b>							
60.5422(a) & 60.487a(c)(2)(vii)	Leak Count	0	6	0	4	0	1
60.5422(a) & 60.487a(c)(2)(viii)	Repaired late	0	1	0	1	0	0

Flare System [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
<b>Valves – Gas Vapor/Light Liquid</b>							
60.487a(c)(2)(i)	Leak count	0	0	0	0	0	0
60.487a(c)(2)(ii)	Repaired Late	0	0	0	0	0	0
<b>Pumps – Light Liquid</b>							
60.487a(c)(2)(iii)	Leak Count	0	0	0	0	0	0
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
<b>Pressure Relief Devices – Gas Vapor/Light Liquid</b>							
60.5422(c)(1)	Leak Count	0	0	0	0	0	0
60.5422(c)(2)	Repaired late	0	0	0	0	0	0
<b>Connectors</b>							
60.5422(a) & 60.487a(c)(2)(vii)	Leak Count	0	0	0	0	0	0
60.5422(a) & 60.487a(c)(2)(viii)	Repaired late	0	0	0	0	0	0

**Reporting per 60.487(c)(2)(vii)**

See attached Delay of Repair History Report.

**Reporting per 60.487(c)(3)**

There was a process unit shutdown in May 2019 during the semi-annual period covered by this report.

**Reporting per 60.487(c)(4)**

Reportable Inventory Components	Previous Period Ending 12/31/2018	Current Period Ending 6/30/2019
Valves (Excluding no detectable emissions) (60.487a(b)(2))	1,476	1,464
Pumps (excluding dual-seal and closed vent) (60.487a(b)(3))	21	21
Compressors (60.487a(b)(4))	n/a	n/a
Connectors (60.487a(b)(5))	5,810	5,835
PRV's that vent to atmosphere (60.5422(a) & 60.5401(b))	0	0

**ATTACHMENT 1**  
**NSPS 0000a**  
**DELAY OF REPAIR REPORT**



**Repair Delayed History**

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 2:42:06PM

Facility: KINDER MORGAN - BAKKEN GAS PLANT

Regulation: EPA60-0000a

Unit: 4 REFRIGERATION &amp; OVERHEAD COMPRESSORS (0000)

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
0510B.04	CLVS-H	PROPANE PROPANE	W. OF C-2 REFRIG COMPR. BLOWDOWN TO FLARE VALVE.	11/16/2018		Yes	11/21/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-16-18 LEAK LOG.	5/31/2019	5/17/2019

Total Components on Delay During Reporting Period for 4 REFRIGERATION &amp; OVERHEAD COMPRESSORS (0000a): 1

(b) (6)

Signature of Owner or Operator Responsible for Delay or Repair Decision

### Repair Delayed History

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 2:42:08PM

Facility: KINDER MORGAN - BAKKEN GAS PLANT

Regulation: EPA60-0000a

Unit: 5 FRACTIONATION TRAIN 1 (0000a)

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
1322B	PUMP	PROPANE PROPANE	ON DEPROP SKID. P-620-1 #1 DEPROPANIZER NORTH REFLUX PUMP 1.	7/8/2018	97,697	Yes	6/11/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 5-29-18 LEAK LOG.	5/31/2019	5/17/2019
1301.02	CONECT	NGLs NATURAL GAS LIQUIDS	AT N.W. CORNER OF DEPROP SKID. ABOVE LINE FROM REFLUX PUMPS.	11/16/2018	7,557	Yes	11/21/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-16-18 LEAK LOG.	5/31/2019	5/17/2019
1305.01	CONECT	NGLs NATURAL GAS LIQUIDS	AT N.W. CORNER OF DEPROP SKID. UNDER PIPE.	11/16/2018	9,637	Yes	11/21/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-16-18 LEAK LOG.	5/31/2019	5/17/2019
1337.02	CONECT	PROPANE PROPANE	E. OF V8-620-1 #1 DEPROP REFLUX ACCUM. UNDER CTRL LOOP TO STORAGE TKS.	11/17/2018	12,760	Yes	11/21/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-17-18 LEAK LOG.	5/31/2019	5/17/2019
1290A	VALVE	PROPANE PROPANE	(ESV-620) AT S. END OF DEPROP SKID. ON LINE TO V8-620-1 #1 DEPROP REFLUX ACCUM.	1/16/2019	1,029		1/16/2019	Repair is technical infeasible without a unit shutdown.	Leaker Log	5/31/2019	5/17/2019
0403A	VALVE	NG NATURAL GAS	ON S.E. SIDE OF V-424 3-PHASE SEP. ABOVE HIGH SG. OVHD.	1/16/2019	1,063		1/16/2019	Repair is technically infeasible without a process unit shutdown.	Leak Log signed by plant.	5/31/2019	5/17/2019
1275.01	CONECT	PROPANE PROPANE	ON S.E. SIDE OF G8-620 #1 DEPROP REBOILER.	2/5/2019	72,198		2/6/2019	Repair is technically infeasible without a unit shutdown.	Leaker log signed by plant manager.	5/31/2019	5/17/2019
1277.01	CONECT	NGLs NATURAL GAS LIQUIDS	ON S.E. SIDE OF G8-620 #1 DEPROP REBOILER.	2/5/2019	7,715		2/6/2019	Repair is technically infeasible without unit shutdown.	Leaker log signed by plant manager.	5/31/2019	5/17/2019

**Repair Delayed History**

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 2:42:08PM

Facility: KINDER MORGAN - BAKKEN GAS PLANT

Regulation: EPA60-0000a

Unit: 5 FRACTIONATION TRAIN 1 (0000a)

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
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Total Components on Delay During Reporting Period for 5 FRACTIONATION TRAIN 1 (0000a): 8

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

### Repair Delayed History

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 2:42:08PM

Facility: KINDER MORGAN - BAKKEN GAS PLANT

Regulation: EPA60-0000a

Unit: 6 FRACTIONATION TRAIN 2 (0000a)

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
1389B	VALVE	NGLs NATURAL GAS LIQUIDS	ON N.W. SIDE OF V10-621-1 #2 DEPROP TWR.	7/8/2018	9,338	Yes	7/9/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 7-8-18 LEAK LOG	5/31/2019	5/17/2019
1396A	VALVE	NGLs NATURAL GAS LIQUIDS	ON E. SIDE OF V10-621-1 #2 DEPROP TWR.	7/8/2018	1,876	Yes	7/9/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 7-8-18 LEAK LOG	5/31/2019	5/17/2019
1473	VALVE	NGLs NATURAL GAS LIQUIDS	ON W. SIDE OF DEBUT SKID. ON LINE TO V10-621-1 #2 DEPROP TWR.	7/8/2018	3,997	Yes	7/9/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 7-8-18 LEAK LOG	5/31/2019	5/17/2019
1475	VALVE	NGLs NATURAL GAS LIQUIDS	IN MIDDLE OF DEBUT SKID. ON LINE TO V10-621-1 #2 DEPROP TWR.	7/8/2018	21,198	Yes	7/9/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 7-8-18 LEAK LOG	5/31/2019	5/17/2019
1491	VALVE	NGLs NATURAL GAS LIQUIDS	ON S.W. SIDE OF V8-630 DEBUT REFLUX ACCUM.	7/8/2018	11,398	Yes	7/9/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 7-8-18 LEAK LOG	5/31/2019	5/17/2019
1472	VALVE	NGLs NATURAL GAS LIQUIDS	ON W. SIDE OF DEBUT SKID. ON CTRL LOOP TO V10-621-1 #2 DEPROP TWR.	8/31/2018	1,743	Yes	9/3/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 8-31-18 LEAK LOG.	5/31/2019	5/17/2019
0689-03	CONNECT	NG NATURAL GAS	ON TOP N. END OF E-213 DEETH REBOILER.	10/21/2018	20,375	Yes	10/26/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 10-21-18 LEAK LOG.	5/31/2019	1/10/2019
1474	VALVE	NGLs NATURAL GAS LIQUIDS	IN MIDDLE OF DEBUT SKID. ON LINE TO V10-621-1 #2 DEPROP TWR.	10/22/2018	1,368	Yes	10/29/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 10-22-18 LEAK LOG.	5/31/2019	5/17/2019



**Repair Delayed History**

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 2:42:08PM

Facility: KINDER MORGAN - BAKKEN GAS PLANT

Regulation: EPA60-0000a

Unit: 6 FRACTIONATION TRAIN 2 (0000a)

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
1451.01	CONNECT	NGLs NATURAL GAS LIQUIDS	AT S. END OF DEBUT SKID. OFF G8-631-A UTUBE EXCH. UNDER PSV-631B.	11/18/2018	1,798	Yes	11/20/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-18-18 LEAK LOG.	5/31/2019	5/17/2019
1451.04	CONNECT	NGLs NATURAL GAS LIQUIDS	AT S. END OF DEBUT SKID. OFF G8-631-A UTUBE EXCH. UNDER PSV-631B.	11/18/2018	10,898	Yes	11/24/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-18-18 LEAK LOG	5/31/2019	5/17/2019
1421DA	VALVE	NGLs NATURAL GAS LIQUIDS	ON S. SIDE OF V10-630 DEBUT TWR.	1/16/2019	2,289		1/16/2019	Repair is technically infeasible without a unit shutdown.	Leaker Log	5/31/2019	5/17/2019
1389B.04	CONNECT	NGLs NATURAL GAS LIQUIDS	ON N. SIDE OF V10-621-1 #2 DEPROP TWR.	2/5/2019	189,998		2/6/2019	Repair is technically infeasible without unit shutdown.	Leaker log signed by plant manager.	5/31/2019	5/17/2019

Total Components on Delay During Reporting Period for 6 FRACTIONATION TRAIN 2 (0000a): 12

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

### Repair Delayed History

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 2:42:08PM

Facility: KINDER MORGAN - BAKKEN GAS PLANT

Regulation: EPA60-0000a

Unit: 7 STORAGE TANKS & LOADING (0000a)

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
0885	VALVE	PROPANE PROPANE	UNDER MIDDLE OF TK-807 PROPANE STORAGE TK 3.	7/9/2018	1,546	Yes	7/22/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 7-9-18 LEAK LOG	5/31/2019	5/17/2019
1608	VALVE	NGLs NATURAL GAS LIQUIDS	S. OF SIDNEY RAIL PIG LAUNCHER (HYPERSEAL VLV)	7/9/2018	62,998	Yes	7/23/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 7-9-18 LEAK LOG.	5/31/2019	5/17/2019
1673	VALVE	NGLs NATURAL GAS LIQUIDS	E. OF P-1 S. PIPELINE PUMP. OFF SIDNEY RAIL METER LINE.	7/9/2018	655	Yes	7/9/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 7-9-18 LEAK LOG.	5/31/2019	5/17/2019
0882B	VALVE	NG NATURAL GAS	IN P/R W. OF TK-808 BUTANE STORAGE TK 4. ON VAPOR LINE.	8/31/2018	1,351	Yes	9/13/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 8-31-18 LEAK LOG.	5/31/2019	5/17/2019
2276.03	CONNECT	NGLs NATURAL GAS LIQUIDS	ON S. SIDE OF RERUN N. UNLOAD RACK #7. UNDER PSV-812A.	11/18/2018	2,082	Yes	11/20/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-18-18 LEAK LOG	5/31/2019	5/17/2019
2276A.04	CONNECT	NGLs NATURAL GAS LIQUIDS	(PSV-812E) ON S. SIDE OF RERUN N. UNLOAD RACK #7. ABOVE LIQ IN LINE.	11/18/2018	4,557	Yes	11/20/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-18-18 LEAK LOG	5/31/2019	5/17/2019
1575	RELIEF	PROPANE PROPANE	(PSV-807) ABOVE MANWAY ON TOP E. END OF TK-807 PROPANE STORAGE TK 3.	11/19/2018	51,499	Yes	12/20/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 12-6-18 LEAK LOG.	5/31/2019	5/17/2019
1584	RELIEF	PROPANE PROPANE	(PSV-806) ABOVE MANWAY ON TOP E. END OF TK-806 PROPANE STORAGE TK 2.	11/19/2018	7,950	Yes	12/20/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 12-6-18 LEAK LOG.	5/31/2019	5/17/2019

**Repair Delayed History**

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 2:42:08PM

Facility: KINDER MORGAN - BAKKEN GAS PLANT

Regulation: EPA60-0000a

Unit: 7 STORAGE TANKS &amp; LOADING (0000a)

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
0954B.01	CONNECT	NGLs NATURAL GAS LIQUIDS	IN P/R N.W. OF V-690 BG MIX STORAGE TK 10. ON E. SIDE OF GRATED PLTFM.	11/20/2018	3,342	Yes	12/3/2018	Repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur.	AUTHORIZED BY PLANT ON 11-20-18 LEAK LOG.	5/31/2019	5/17/2019
1661	VALVE	NGLs NATURAL GAS LIQUIDS	E. OF P-1 S. PIPELINE PUMP. ON SIDNEY RAIL METER LINE.	2/5/2019	3,167		2/18/2019	Repair is technically infeasible without a unit shutdown.	Leaker log signed by plant manager.	5/31/2019	5/17/2019
0770BA.03	CONNECT	NGLs NATURAL GAS LIQUIDS	N.E. OF V-12 DEPROP REFLUX ACCUM. ON S. SIDE OF P/R. BY BEAM.	2/5/2019	232,896		2/6/2019	Repair is technically infeasible without a unit shutdown.	Leak Log signed by plant manager.	5/31/2019	5/17/2019

Total Components on Delay During Reporting Period for 7 STORAGE TANKS &amp; LOADING (0000a): 11

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision